

ESTTA Tracking number: **ESTTA61365**

Filing date: **01/11/2006**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91125615
Party	Plaintiff UNIVERSITY OF SOUTHERN CALIFORNIA
Correspondence Address	SCOTT A. EDELMAN GIBSON DUNN & CRUTCHER, LLP 1801 CALIFORNIA STREET, SUITE 4200 DENVER, CO 80202 sedelman@gibsondunn.com; arobertsonbora@gibsondunn.com
Submission	Plaintiff's Notice of Reliance
Filer's Name	Michael S. Adler, Esq.
Filer's e-mail	pto-cc@gibsondunn.com, madler@gibsondunn.com
Signature	/michael adler/
Date	01/11/2006
Attachments	NOR 18 Redacted.pdf (59 pages)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

UNIVERSITY OF SOUTHERN
CALIFORNIA,

Opposer,

v.

UNIVERSITY OF SOUTH CAROLINA,

Applicant.

Opposition No. 91125615

Serial No. 75/358,031

Mark: **SC (Stylized)**

Filed: September 16, 1997

Published: May 18, 1999

**OPPOSER'S NOTICE OF RELIANCE NO. 18
RELATING TO DOCUMENTS PRODUCED DURING DISCOVERY IN THIS ACTION
AND ADMISSIBLE BY NOTICE OF RELIANCE PURSUANT TO STIPULATION
BETWEEN ALL PARTIES**

[VERSION WITH CONFIDENTIAL PORTIONS REDACTED]

Pursuant to Stipulation Regarding Documents entered into between Opposer the University of Southern California ("Opposer" or "California") and Applicant, the University of South Carolina, ("Applicant" or "Carolina") (collectively "Parties") on or about December 16, 2005, and filed with the Board on December 29, 2005, the Parties have agreed that certain documents produced in discovery in this case may be admitted into evidence by means of a notice of reliance. Specifically, the Parties stipulated as follows with respect to the documents identified below:

Opposer University of Southern California ("California") and University of South Carolina ("Carolina") (collectively "Parties") agree and stipulate that for the purposes of this action, the following documents are authentic and may be admitted into evidence by means of a notice of reliance. The Parties further agree and stipulate that for the purposes of this action these documents shall be considered as business records and/or ancient documents, and the Parties waive any other hearsay objections to the documents *except* that the Parties retain the

right to object to material in such documents that constitutes hearsay within hearsay to the extent that such objections would have been otherwise available.

In accordance with TBMP §§ 704.11 and 705, documents may be made of record in an inter partes proceeding before the Board by stipulation of the parties. Attached as Exhibits 257 through 276, respectively, are true and correct copies of the following documents produced in discovery in this action and stipulated to by the Parties:

Opposer's Exhibit No.	Bates Range	Description
257	APP 01686 - APP 01694	University of South Carolina Trademark and Licensing website ©2002
258	APP 01707	University of South Carolina Appendix B, Indicia, dated 05/02/2002
259	APP 02420 - APP 02474	University of South Carolina Domestic Trademark Licensing Program, Proposal from CLC (various excerpts)
260	APP 00301 - APP 00329	02/05/2004 The Collegiate Licensing Company Standard Retail Product License Agreement with Twins Enterprise, Inc. (various excerpts)
261	APP 00842	CLC Artwork Approval Form
262	APP 00851	iCLC Artwork Approval Form
263	APP 00861	iCLC Artwork Approval Form
264	APP 00929	S&E Sportswear artwork
265	APP 00930	New Era Cap artwork
266	APP 00942	Top of the World artwork
267	APP 01777 - APP 01801	07/22/2002 University of South Carolina Request for Proposal re Exclusive Agent for the Operation of the University of South Carolina's Trademark and Licensing Program (excerpts)
268	APP 01854 - APP 01860	07/23/1997 CLC Quarterly Royalty Report for the University of South Carolina
269	APP 01861	2nd Quarter, 1997 CLC Royalty Analysis for the University of South Carolina

Opposer's Exhibit No.	Bates Range	Description
270	APP 02024 - APP 02029	10/30/2002 Letter from CLC to K. Corbett attaching CLC's Third Quarter 2002 Report for the University of South Carolina (excerpts)
271	APP 02173 - APP 02231	CLC 2003-2004 Fiscal Year Annual Report for the University of South Carolina (various excerpts)
272	APP 02260 - APP 02261	CLC 2004 Third Quarter Report for the University of South Carolina (excerpt)
273	APP 02313 - APP 02354	CLC 2004-2005 Fiscal Year Annual Report for the University of South Carolina (various excerpts)
274	OPP 01703 - OPP 01706	Printout of University of South Carolina merchandise from the FansEdge online retail website
275	APP 00968	2001 Carolina Baseball Media Guide cover
276	APP 02856 - APP 02963	1997 Carolina Baseball Media Guide (various excerpts)

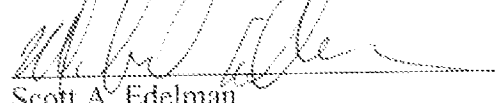
Opposer hereby gives Notice that it will rely upon these documents. The documents are relevant in this action to demonstrate that Applicant did not use any form of "SC" mark in connection with collegiate merchandise until after the filing of the application at issue here. The documents further reflect the fact that Applicant's use of "SC" as a mark is not limited to any single particular stylization (as other universities may be focused on one particular stylization), and the documents moreover reflect the fact that a significant portion collegiate merchandise authorized by Applicant is produced in Opposer's signature Pantone 201 color (known as "Cardinal" or "Garnett" or "Burgundy.") The documents reflect the relationship between licensing revenue and estimated retail sales. The documents also demonstrate various of the channels of trade authorized by Applicant, including mass merchandising stores like Wal-mart, department stores like J.C. Penney, athletic specialty stores like Dick's Sporting Goods and Finish Line, and big box specialty stores like Bed Bath and Beyond, which are also channels of

trade used by Opposer. The documents moreover demonstrate that Applicant authorizes goods without any identifier connected to Applicant other than the "SC" mark. Finally, the documents also reflect Applicant's dominant trademarks, which include the Block C with the Gamecock and the initials "USC" but not any form of the "SC" mark at issue in this Opposition.

Dated: January 19, 2006

Respectfully submitted,

GIBSON, DUNN & CRUTCHER, LLP



Scott A. Edelman

Michael S. Adler

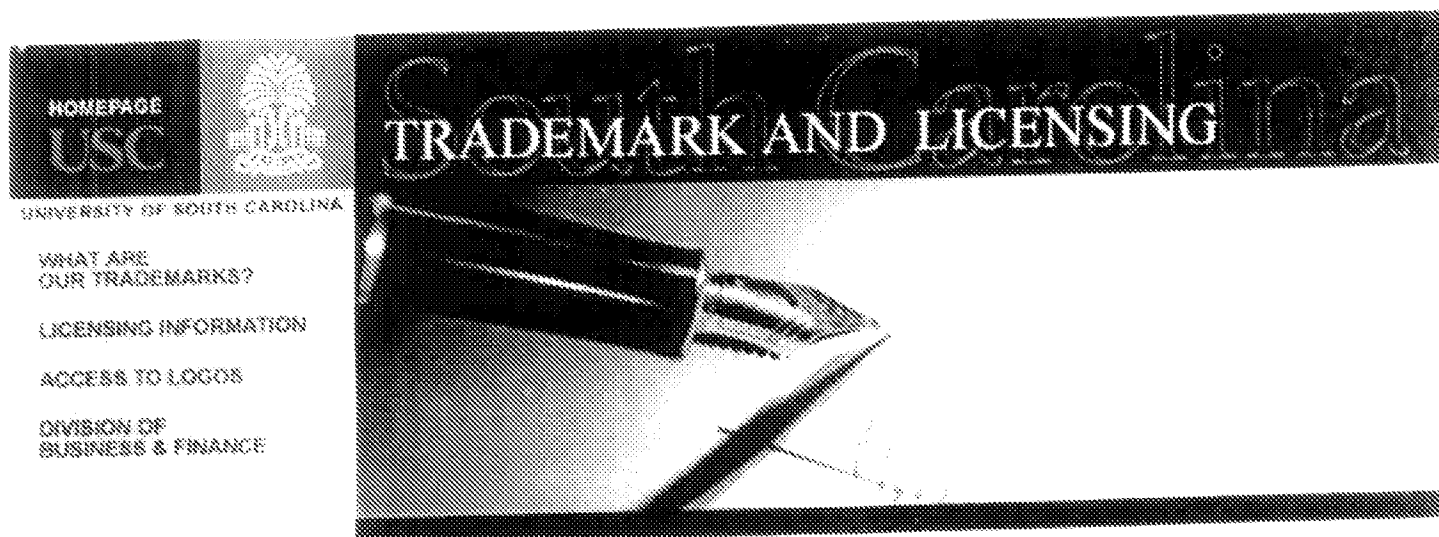
2029 Century Park East

Los Angeles, CA 90067-3026

Telephone: (213) 229-7919

Attorneys for Opposer

University of Southern California



HOMEPAGE
USC



UNIVERSITY OF SOUTH CAROLINA

WHAT ARE
OUR TRADEMARKS?

LICENSING INFORMATION

ACCESS TO LOGOS

DIVISION OF
BUSINESS & FINANCE

What's New

• [USC's New Logo](#)

The University of South Carolina established a Licensing and Trademark program in 1983 to monitor the usage of its logos and verbiage (words associated with the university). The program is under the direction of the Office of Business Affairs, Helen Zeigler Director, and is administered by Ken Corbett ([ken.corbett@usc.edu](#)).

WHAT ARE OUR TRADEMARKS?

Our trademarks include the "Block C", the Gamecock, the University Seal, the University logo, and "Cocky", the Gamecock mascot. Verbiage that is licensed and monitored includes "USC", "University of South Carolina", "Gamecock", or any variation, such as "South Carolina Gamecocks", "Carolina Gamecocks", or "Fighting Gamecocks".

LICENSING INFORMATION

The Collegiate Licensing Company (CLC) is under contract to handle all domestic licensing agreements for the University of South Carolina. For information regarding licensing opportunities on any of the University's logos or verbiage, contact:

Collegiate Licensing Company

290 Interstate North

Suite 200

Atlanta, GA 30339

(770) 958-0520

FAX: (770) 955-4891

[http://www.clc.com](#)

Requests for domestic trademark licensing applications should be made through the Collegiate Licensing Company.

CLC International is under contract to handle all international licensing agreements. For information regarding international licensing opportunities regarding the University of South Carolina, contact:

CLC International

The Collegiate Licensing Company

290 Interstate North, Suite 200

Atlanta, GA 30339

(770) 958-0520

All campus organizations and departments should contact Ken Corbett, Administrator of the Licensing and Trademark Program, for any information regarding internal usage of logos and verbiage. He can be reached at:

Ken Corbett

Administrator of Licensing and Trademarks

Office of the VP and CFO

Thornwell Administrative Annex, Room 201

Columbia, SC 29208

(803) 777-7476

OPP 01686

(803) 777-7315 (press 0000)
(803) 777-5819 (FAX)
E-mail: trademark@usc.edu

RETURN TO TOP	USC LINKS	DIRECTORY	MAP	EVENTS	VIP	SITE INFORMATION
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trademark@usc.edu (803) 777-7315

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OPP 01687


[OFFICIAL LOGOS](#)
[OFFICIAL SEAL](#)
[SPORT SYMBOLS](#)
[OFFICIAL COLORS](#)
[BRACK GUIDE](#)
[LOGO REQUEST FORM](#)
[UNIVERSITY PUBLICATIONS](#)
[TRADEMARK & LICENSING OFFICE](#)
[COLLEGIATE LICENSING COMPANY](#)
[CONTACT US](#)
[GO TO THIS SITE](#)

University Logos

Welcome to the University of South Carolina's official logos and symbols site. This guide provides information about the history, proper use, and restrictions related to USC's symbols. Use of the University's logos is freely available to academic and administrative departments, offices, and student organizations. All other requests are evaluated for non-profit use and may be forwarded to the Trademark and Licensing Office when the end product requires a royalty payment.

Downloadable Files

While information about the symbols is public information, access to the actual art files for reproduction is available only through a password protected site. Access to that site requires the requestor to complete an online questionnaire (see Logo Request Form link to the left) that is evaluated for end-use of the requested art. If approved, the requestor is sent an e-mail with a link to the site and access password. In some cases the requestor may be required to provide additional information in order to process the request.

University Logos and Symbols are Copyright Protected

The University of South Carolina owns many federally registered trademarks. Among them are the University's official seal, logo and logotype, the Gamecock logo, the Block C with Gamecock logo, and the Cockey logo. Use of registered trademarks without the express permission of the University of South Carolina is a violation of federal and state law. Any business or individual who produces commercial items for public view or consumption must be officially licensed. For licensing information, call the Trademark and Licensing Office at 803-777-7478.

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University of South Carolina Board of Trustees

Deposition No. 91125616
Univ. Southern California v.
Univ. South Carolina

Opposer's
Ex. No. 29, Pg. No. 3

OPP 01688

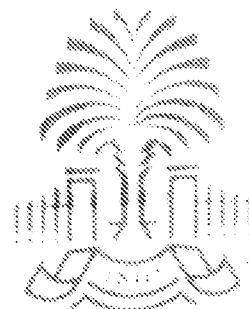
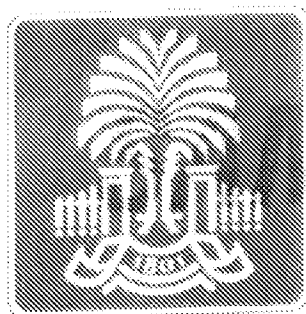

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[OFFICIAL SEAL](#)
[SPORT SYMBOLS](#)
[OFFICIAL COLORS](#)
[USAGE GUIDE](#)
[LOGO REQUEST FORM](#)
[UNIVERSITY PUBLICATIONS](#)
[TRADEMARK & LICENSING OFFICE](#)
[COLLEGIATE LICENSING COMPANY](#)
[SEARCH](#)
[USC](#) [THIS SITE](#)

Official Logos and the USC Visual Identity

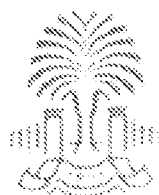
The logos of the University of South Carolina are a graphical representation combining the image of a palmetto tree (the state tree) and the gates to the entrance to the historic Horseshoe. The symbolic elements relate to the heritage and statewide impact of the University.

The gates represent the opportunities provided by higher education and are a direct architectural link to the original campus Horseshoe. The tree represents knowledge and stability. The palmetto is an obvious tie to the state of South Carolina and underscores our position as the state's flagship institution with locations throughout the state. The use of the 1801 founding date emphasizes a proud heritage as we enter our third century of service.

This logo is used as a contemporary design element on many University printed materials, merchandise, and signage.



The logos below are registered variations of the University of South Carolina logo. Each variation is indicated by its name and is available as an electronic file usable in most popular programs such as Microsoft Word and PowerPoint. Files for special applications may be provided upon request.



UNIVERSITY OF
SOUTH CAROLINA

Linear Positive



UNIVERSITY OF
SOUTH CAROLINA

Linear Reverse

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Univ. South Carolina

Opposer's
Ex. No. 251 Pg. No. 11

OPP 01689

7/28/2001





Student Revenue

If you require USC logo t-shirts please click on the Logo Request Form link on the left

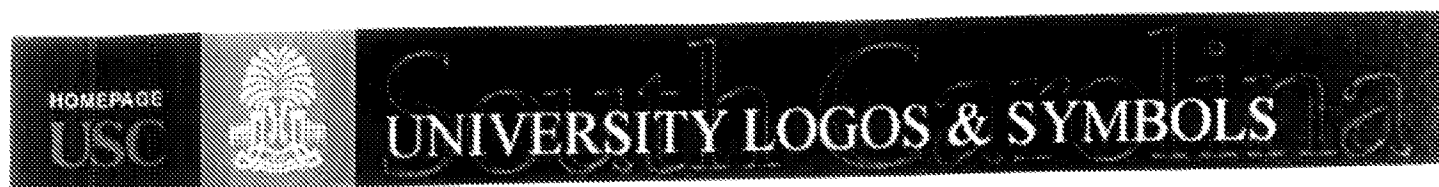
Private vendors wishing to use these logos on saleable merchandise must contact the University of South Carolina for rights and terms of use

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Opposition No. 01125615
Univ. Southern California v
Univ. South Carolina

Opposer's
Ex. No. 253, Pg. No. 6

OPP 01691



UNIVERSITY OF SOUTH CAROLINA

USC IMAGES HOME

OFFICIAL LOGOS

OFFICIAL SEAL

SPORT SYMBOLS

OFFICIAL COLORS

IMAGE GUIDE

LOGO REQUEST FORM

UNIVERSITY
PUBLICATIONSTRADEMARK &
LICENSING OFFICECOLLEGIATE LICENSING
COMPANY

SEARCH


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[THIS SITE](#)

The official University of South Carolina sport symbols shown here are available for download. Artwork for various other symbols and images used by athletic teams is not available through the Web site.



Gamecock and Block C

The Gamecock is the symbol for USC athletics and is normally used as a spirit logo in material related to student activities and athletic teams and events. The Gamecock may appear separately or be combined with the traditional Block C.



Cocky

Cocky is the USC mascot and is used as a spirit logo in material related to

Opposition No. 01128415
Univ. of Southern California v.
Univ. of South Carolina

Opposer's
Ex. No. 253 Pg. No. 1

OPP 01692



student activities and
athletic teams and events.

If you require USC logo files please click on the Logo Request Form link on the left.

Private vendors wishing to use these logos on salable merchandise must contact USC for rights and terms of use.

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University of South Carolina Board of Trustees

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Ciposition No. 91125615
Univ. Southern California v
Univ. South Carolina

Opposer's
Ex. No. 251 Pg. No. 8

OPP 01693



UNIVERSITY OF SOUTH CAROLINA

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OFFICIAL SYMBOLS

OFFICIAL COLORS

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GO TO REQUEST FORM

UNIVERSITY
PUBLICATIONS
TRADEMARK &
LICENSING OFFICECOLLEGIATE LICENSING
COMPANY

SEARCH


[* USC](#)
[THIS SITE](#)

Official Colors

Garnet and black are the official colors of the University of South Carolina.

Inks

In print material several ink colors can be used as approximations for garnet and each use may require a different combination for best effect.

In a 1-color (garnet) use, Pantone® ink colors PMS200 (on uncoated stock) or PMS201 (on coated stock) can be used. These inks give very different results on different papers.

In a 2-color (garnet and black) use, the ink choice for garnet may need to be adjusted for paper and to provide sufficient contrast with the black ink.

In 4-color process work the following are good guidelines:

Uncoated stock—0% cyan, 100% magenta, 65% yellow, and 15% black.

Coated stock—10% cyan, 100% magenta, 65% yellow, and 25% black.

Web and Video

Web page viewing of colors varies by monitor and viewing conditions. The USC Web pages use a Web safe RGB of 960000.

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Columbia, SC 29208 • 803-777-7000 • [USC](#)

University of South Carolina Board of Trustees

Opposition No. 01125815
Univ. Southern California v
Univ. South Carolina

Opposer's
Ex. No. 281 Pg. No. 9

OPP 01694

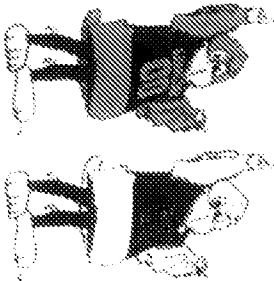
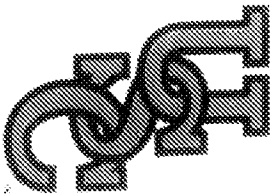
UNIVERSITY OF SOUTH CAROLINA is the owner of all rights, title and interest in and to the following indicia, which includes trademarks, service marks, trade names, designs, logos, seals and symbols:

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Journal of Management Education
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<http://jme.sagepub.com>

PRODUCTION OF WATER QUALITY

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in addition to the indicia shown above, any indicia adopted hereafter and used or approved for use by the UNIVERSITY OF SOUTH CAROLINA shall be deemed to be additions to the indicia as though shown above and

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University of South Carolina & Carolina Encyclopedia

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Unit Coordinator

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Journal of Management Inquiry

Sub-Center Districts

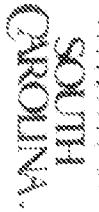
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CONCLUSIONS

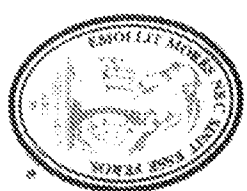
Source: *Author's calculations*.

www.elsevier.com/locate/bsc

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1003



THE UNIVERSITY OF CHICAGO

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REDACTED
Entire Exhibit No. 259
HIGHLY CONFIDENTIAL

REDACTED
Entire Exhibit No. 200
HIGHLY CONFIDENTIAL

REDACTED
Entire Exhibit No. 261
CONFIDENTIAL

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Entire Exhibit No. 202
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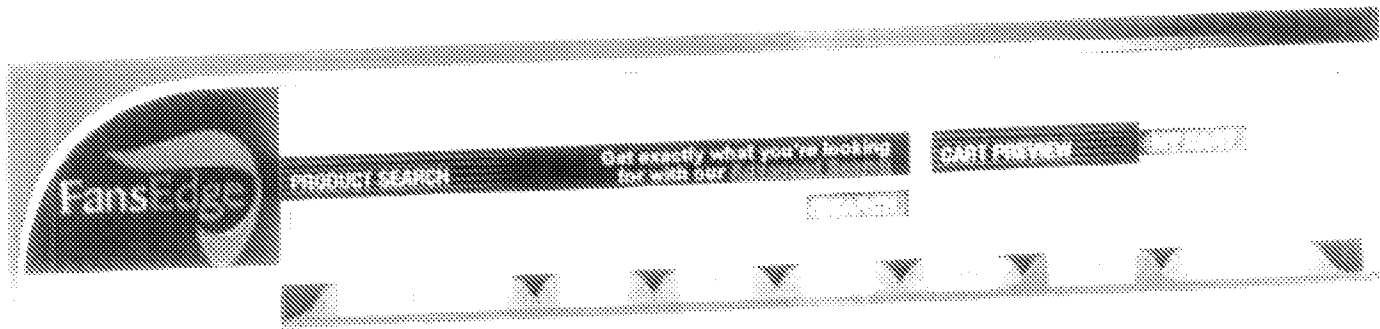
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Entire Exhibit No. 273

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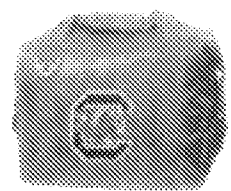
South Carolina Fighting Gamecocks Great Father's Day Gift Ideas

Shop By Team
All Sports

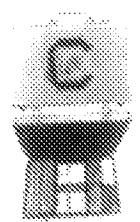
Categories



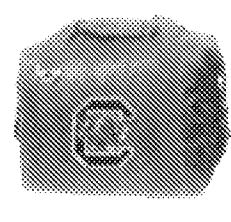
1. White One-Eyed Monster
NEW \$19.99



2. Black One-Eyed Monster
NEW \$19.99



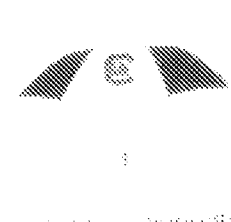
3. White Puke Gamecocks
NEW \$19.99



4. Black Puke Gamecocks
NEW \$19.99



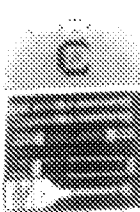
5. White Puke Gamecocks
NEW \$19.99



6. Black Puke Gamecocks
NEW \$19.99

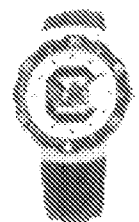


7. White Puke Gamecocks
NEW \$19.99

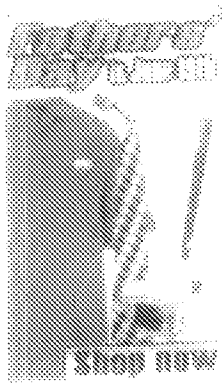


Exposition No. 12125615
Dist. Southern California
Dist. South Carolina

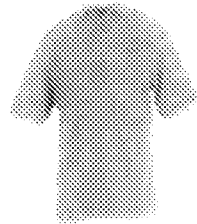
Opposer's
Ex. No. 211 Pg. No. 1



OPP 01701



1. Prince HBO Shirt
 NEW \$12.99



2. Prince T-shirt Shirts
 \$12.99

3. Prince Watch
 \$12.99

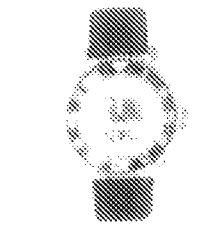
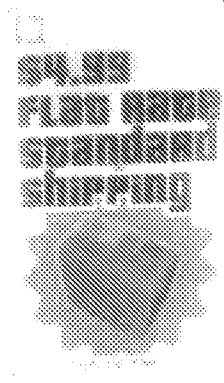


4. Competitor - Prince T-shirt
 Shirts
 \$12.99

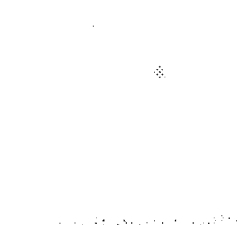
5. Competitor
 \$12.99



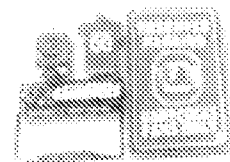
6. Competitor - Prince T-shirt
 Shirts
 \$12.99



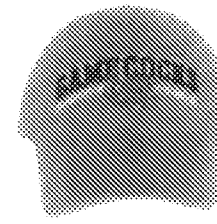
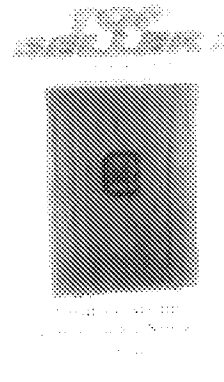
7. Competitor Watch
 \$12.99



8. Competitor Watch
 \$12.99



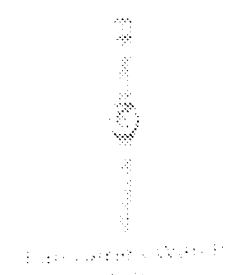
9. Competitor Watch
 \$12.99



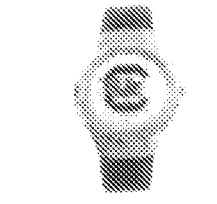
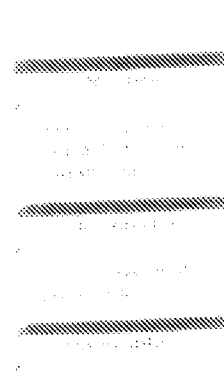
10. Competitor Watch
 \$12.99



11. Competitor Watch
 \$12.99



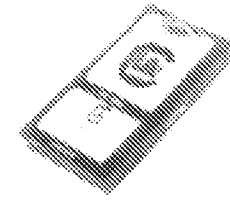
12. Competitor Watch
 \$12.99



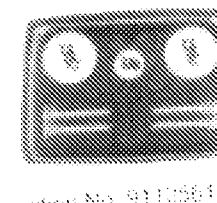
13. Competitor Watch
 \$12.99



14. Competitor Watch
 \$12.99



15. Competitor Watch
 \$12.99



16. Competitor Watch
 \$12.99



17. Competitor Watch
 \$12.99



18. Competitor Watch
 \$12.99

Juste de l'Université de la Nouvelle
 École
 de la Nouvelle

[illegible]

Example: Adjusted R² = 0.75



Date Rec'd: Colored Copy
 5/18/90
 12:15

1. *Journal of Management Education* 20(1): 1-10
 2. *Journal of Management Education* 20(1): 11-19

Notes:

[illegible][illegible]

Department of Political Science and Center for
International Studies

[illegible]

1. *Journal of Management Studies*, 1991, 28, 1, 1-14.
 2. *Journal of Management Studies*, 1991, 28, 2, 1-14.



After - Assume Day Spent Outside



2000 - Grand Bay Street
Station



Agent's General Remarks:
 Positive results.

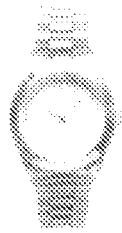


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QPP 0176

Appellate No. 81125618
 Univ. Southern California
 Univ. South Carolina

Ex. No. 274 Pg. No. 3



Black Sapphire Series
Watch
NEW 2010



MVP 1 Hand with Date Watch
NEW



MVP Chronograph Watch
NEW 2010



Black Performance Pocket
Watch
NEW 2010



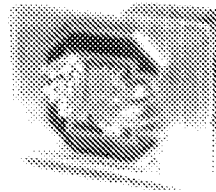
Playboy Watch
NEW 2010



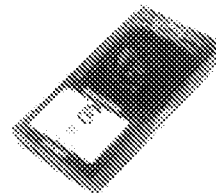
Pocket Watch
NEW



Latitude 100
NEW



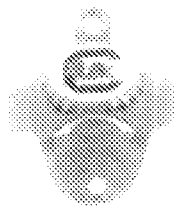
Latitude 100
NEW



Latitude 100
NEW 2010



Vanity Watch
NEW



Vanity Mounted
NEW 2010

OPP 01706

Opposition No. 01125/15
Opp. Southern California
Game, South Carolina

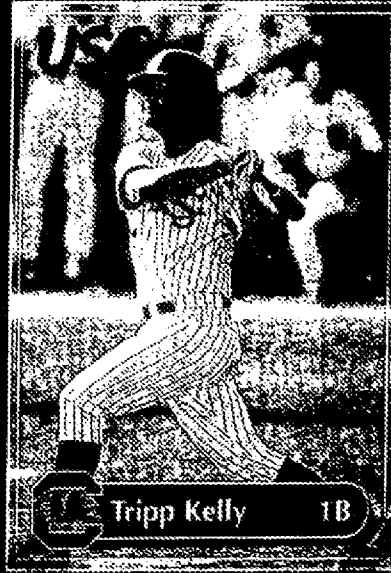
Opposer's
Ex No. 211, Pg No. 11

Exhibit 1 - Opposer's Southern California Fighting Game(s) and Game(s) for which the Game(s) Markings are used

Carolina Baseball 2001



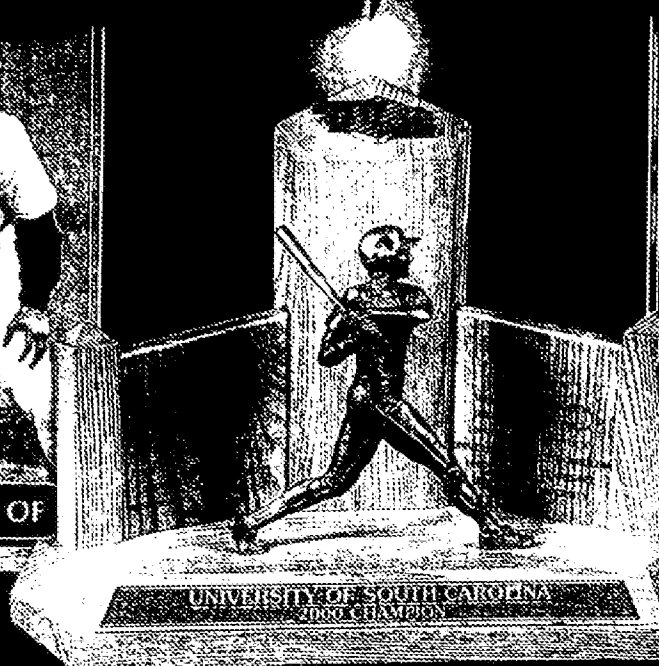
Kip Bouknight P



Tripp Kelly 1B

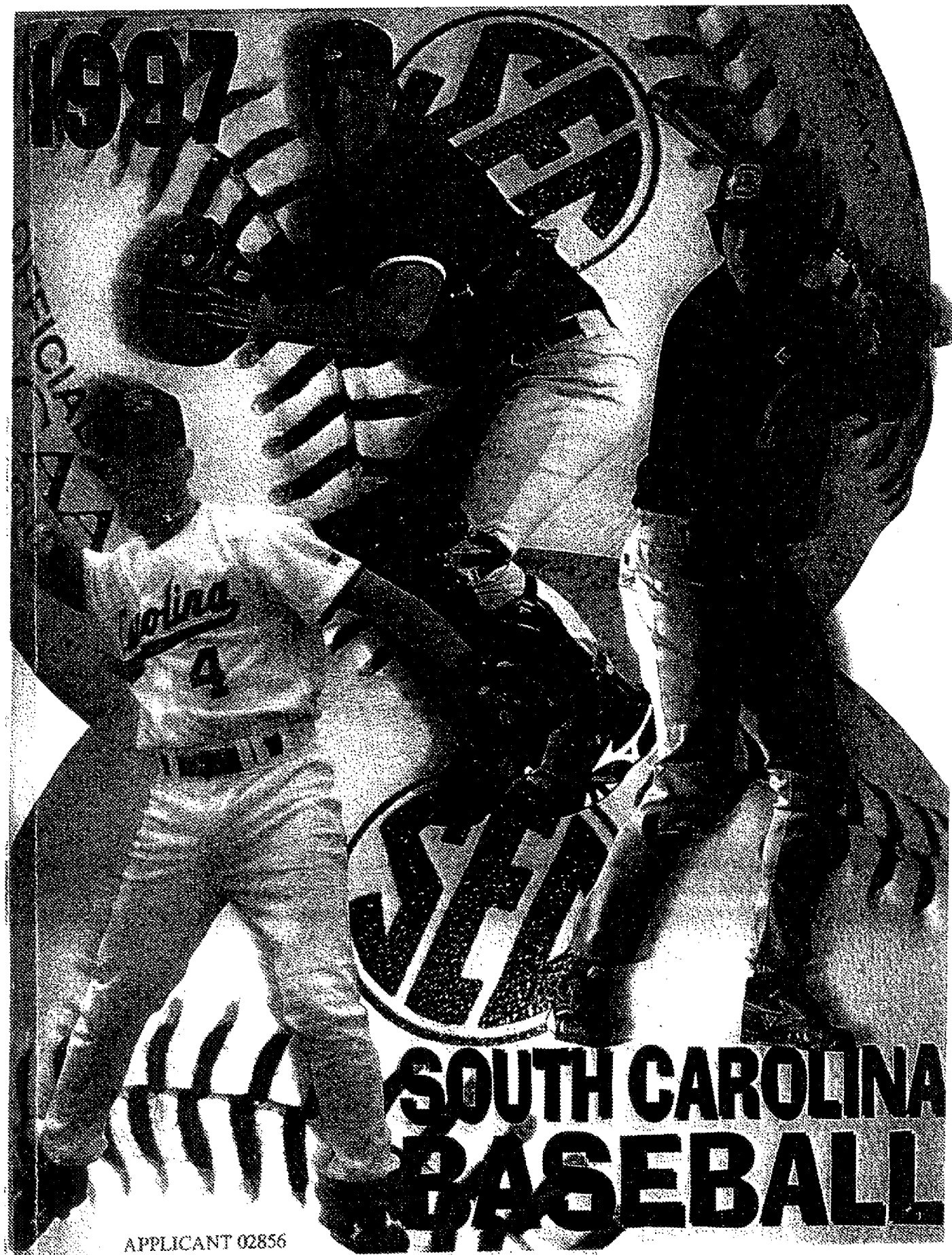


Brennan Dees OF



Chris Plummer 3B

uscsports.com



APPLICANT 02856

Opposition No. 91125615
Univ. Southern California v.
Univ. South Carolina

Opposer's
Ex. No. 276, Pg. No. 1



Fritz Von Kolnitz (1967)



Dan Reeves (1977)



Bobby Bryant (1979)



Jeff Grantz (1985)

Six athletes who played baseball have been inducted into the University of South Carolina Athletic Hall of Fame.

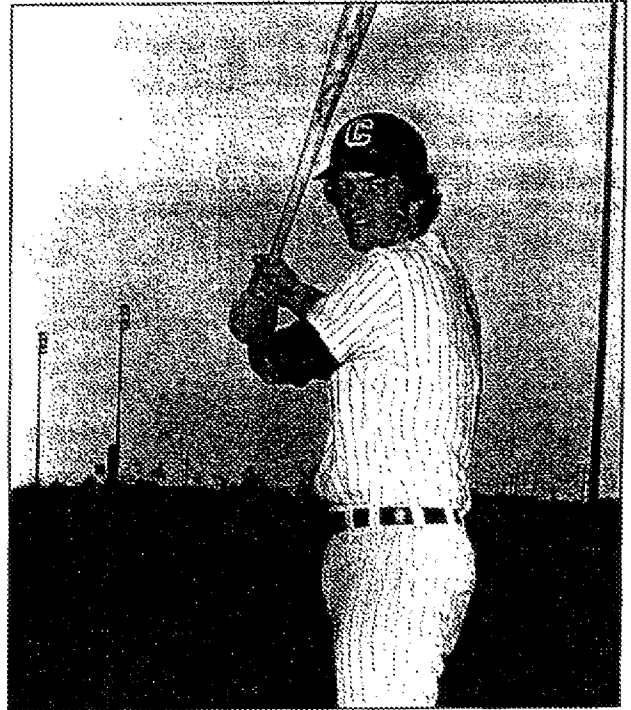
Two of them, righthanded pitcher Earl Bass and first baseman Hank Small, were voted into the hall of fame strictly on their baseball accomplishments while Alfred H. (Fritz) Von Kolnitz, Dan Reeves, Bobby Bryant and Jeff Grantz were chosen primarily as football players but all four were outstanding baseball players as well.

Small, the premier slugger in South Carolina's rise to national prominence, 1972-75, was inducted in 1991. Bass, Small's classmate and fellow All-America, was inducted in 1989. Grantz was chosen in 1985, Bryant in 1979, Reeves in 1977, and Von Kolnitz in 1967.

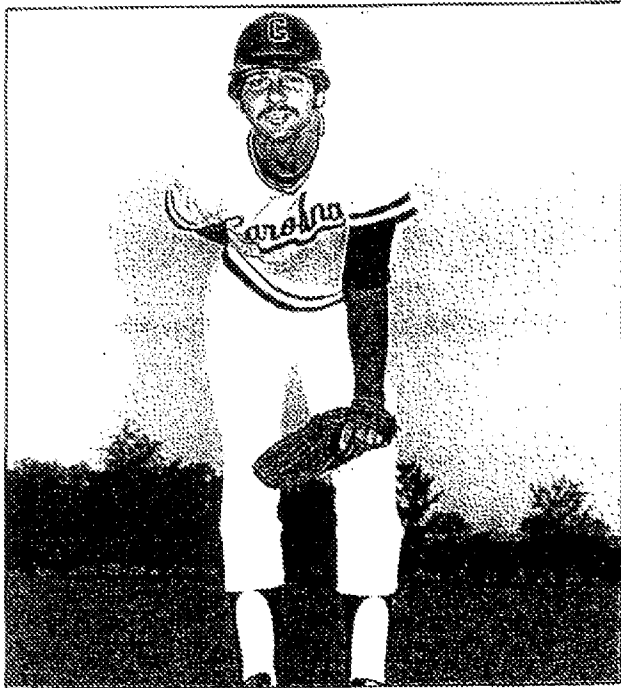
Small was a second team All-America in 1974 and first team in 1975. He compiled a .354 career batting average and still holds a number of school career records, including most home runs. Bass, despite missing most of one season with an arm injury, compiled a 34.3 career record, 17-1 in 1975, and was a two time first team All-America, 1974 and '75. He still holds the school career strikeout record with 392.

Bass and Small led the Gamecocks to a 150-45-1 record, 1972-75, and South Carolina's first two NCAA Tournament berths in 1974 and '75. The Gamecocks won a regional championship in 1975 and finished second behind Texas in the College World Series.

Bass was drafted by the St. Louis Cardinals and started his professional career at the AAA level, but an arm injury kept him out of the



Hank Small (1991)



Earl Bass (1989)

major leagues. Small signed with the Atlanta Braves, led the AAA International League in home runs and was the league's MVP, but his major league career was limited to one game with the Braves.

Grantz played three seasons as a teammate of Bass and Small, lettering 1973-74-75-76, and set school fielding records at both second base and shortstop. In addition, he was a second team All-America quarterback in football.

Bryant, a lefthanded pitcher, was the first South Carolina pitcher to strike out 100 batters in a season, lettering 1965-66-67. He was drafted by both the Boston Red Sox and New York Yankees, but was also an All-America defensive back in football and opted for the NFL, playing 14 seasons with the Minnesota Vikings where he was a member of four Super Bowl teams.

Reeves, an outstanding college quarterback who became an NFL running back with the Dallas Cowboys, played baseball only one season, 1964, and demonstrated perhaps the finest throwing arm of any Gamecock outfielder. He has been a national football league coach with the Denver Broncos and New York Giants.

Von Kolnitz, also an outstanding football halfback, lettered as a catcher in baseball, 1912-13, and played major league baseball as a third baseman and outfielder with the Cincinnati Reds, 1914-15, and Chicago White Sox, 1916.

CAROLINA IN THE MAJOR LEAGUES

Michael David (Dave) Hollins — Born May 25, 1966 at Buffalo, NY, 6-1, 190. Bats left and right, throws right. Lettered at Carolina 1985-86-87.

Year	Club	Lea.	Pos.	G	AB	R	H	2B	3B	HR	RBI	AVG
1990	Philadelphia	N	3B	72	314	14	21	0	0	5	15	.111
1991	Philadelphia	N	3B	56	151	18	45	10	2	6	23	.298
1992	Philadelphia	N	3B	156	586	104	158	28	4	27	93	.270
1993	Philadelphia	N	3B	143	543	104	148	30	4	18	93	.273
1994	Philadelphia	N	3B	44	162	28	36	7	1	4	26	.222
1995	Philadelphia	N	3B	65	205	46	47	12	2	7	25	.229
	Boston	A	3B	5	13	2	2	0	0	0	1	.154
1996	Minnesota	A	3B	122	422	71	102	26	0	13	53	.242
	Seattle	A	3B	27	94	17	33	3	0	3	25	.351
National League				536	1761	514	455	87	13	67	273	.258
American League				154	529	90	137	29	0	16	79	.259
Major League Totals				690	2290	404	592	116	13	83	352	.259

All-Star Game Record

Year	Club	Lea.	Pos.	G	AB	R	H	2B	3B	HR	RBI	AVG
1993	National League PH			1	1	0	1	1	0	0	0	1.000

Championship Series Record

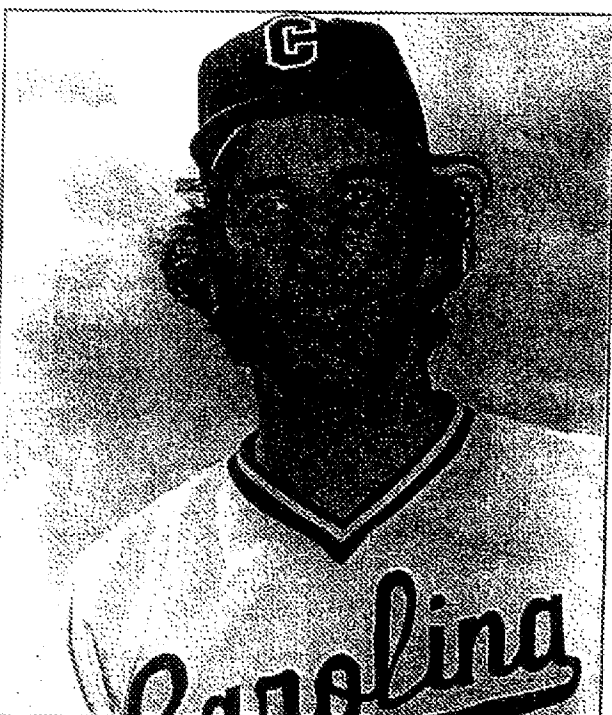
Year	Club	Lea.	Pos.	G	AB	R	H	2B	3B	HR	RBI	AVG
1993	Philadelphia	N	3B	6	20	2	4	1	0	2	4	.200

World Series Record

Year	Club	Lea.	Pos.	G	AB	R	H	2B	3B	HR	RBI	AVG
1993	Philadelphia	N	3B	6	23	5	6	1	0	0	2	.261

Brian Williams — Born Feb. 15, 1969 at Lancaster, SC, 6-2, 200. Bats right, throws right. Lettered at Carolina 1988-89-90.

Year	Club	Lea.	G	IP	W	L	Pct.	H	R	ER	SO	BB	ERA
1991	Houston	N	2	12.0	0	1	.000	11	5	5	4	4	3.75
1992	Houston	N	16	96.1	7	6	.538	92	44	42	42	54	3.92
1993	Houston	N	42	82.0	4	4	.500	76	48	44	56	38	4.83
1994	Houston	N	20	78.1	6	5	.545	112	64	50	49	41	5.74
1995	San Diego	N	44	72.0	3	10	.231	79	54	48	75	38	6.00
1996	Detroit	A	40	121.0	3	10	.231	145	107	91	72	85	6.77
National League			124	340.2	20	26	.435	329	215	189	226	175	5.00
American League			40	121.0	3	10	.231	145	107	91	72	85	6.77
Major League Totals			164	461.2	23	36	.390	515	322	280	298	260	5.46



Randy Martz was named the nation's top collegiate baseball player in 1977 when he compiled a 14-0 pitching record in leading South Carolina to a second place finish in the College World Series.

Roy Bunyan (Tripp) Cromer III — Born Nov. 21, 1967 at Lake City, SC, 6-3, 170. Bats right, throws right. Lettered at Carolina 1987-88-89.

Year	Club	Lea.	Pos.	G	AB	R	H	2B	3B	HR	RBI	AVG
1993	St. Louis	N	SS	10	23	1	2	0	0	0	0	.087
1994	St. Louis	N	SS	2	0	1	0	0	0	0	0	...
1995	St. Louis	N	SS	105	345	36	78	19	0	5	18	.226
Major League Totals				117	368	38	80	19	0	5	18	.217

Horace Michael (Mike) Cook — Born August 14, 1963 at Charleston, SC, 6-3, 200. Bats left, throws right. Lettered at Carolina 1983-84-85.

Year	Club	Lea.	G	IP	W	L	Pct.	H	R	ER	SO	BB	ERA
1986	California	A	5	9.0	0	2	.000	13	12	9	6	7	9.00
1987	California	A	16	34.1	1	2	.333	34	21	21	27	18	5.50
1988	California	A	3	3.2	0	1	.000	4	2	2	2	1	4.91
1989	Minnesota	A	15	21.1	0	1	.000	22	12	12	15	17	5.06
1993	Baltimore	A	2	3.0	0	0	...	1	0	0	3	2	0.00
Major League Totals			41	71.1	1	6	.143	74	47	44	53	45	5.55

Thomas William (Bill) Landrum — Born Aug. 17, 1957 at Columbia, SC, 6-2, 185. Batted right, threw right. Lettered at Carolina 1978-80 (Injured in 1979).

Year	Club	Lea.	G	IP	W	L	Pct.	H	R	ER	SO	BB	ERA
1986	Cincinnati	N	18	13.1	0	0	...	23	11	10	14	4	6.75
1987	Cincinnati	N	44	65.0	3	2	.600	68	35	34	42	34	4.71
1988	Chicago	N	7	12.1	1	0	1.000	19	8	8	6	3	5.84
1989	Pittsburgh	N	56	81.0	2	3	.400	80	46	46	51	28	5.67
1990	Pittsburgh	N	54	71.2	7	3	.700	69	22	17	39	21	2.15
1991	Pittsburgh	N	61	76.1	4	4	.500	76	32	27	45	19	3.18
1992	Montreal	N	18	20.0	1	1	.500	27	16	16	7	9	7.20
1993	Cincinnati	N	18	21.2	0	2	.000	18	9	9	14	6	3.74
Major League Totals			268	361.1	18	15	.543	360	151	136	218	124	3.38
Major League Seasons			1987 (2); 1989 (26); 1990 (13); 1991 (17)										

Championship Series Record

Year	Club	Lea.	G	IP	W	L	Pct.	H	R	ER	SO	BB	ERA
1990	Pittsburgh	N	2	2	0	0	...	0	0	0	1	0	0.00
1991	Pittsburgh	N	1	1	0	0	...	2	1	1	2	2	9.00
Totals			3	3	0	0	...	2	1	1	3	2	3.00

William Haywood (Mookie) Wilson — Born Feb. 9, 1956 at Bamberg, SC, 5-10, 170. Batted right and left, threw right. Lettered at Carolina 1977.

Year	Club	Lea.	Pos.	G	AB	R	H	2B	3B	HR	RBI	AVG
1980	New York	N	OF	27	105	16	26	5	3	0	4	.248
1981	New York	N	OF	92	328	49	89	8	8	3	14	.271
1982	New York	N	OF	159	639	90	179	25	9	5	53	.279
1983	New York	N	OF	152	638	91	176	25	6	7	51	.276
1984	New York	N	OF	154	587	88	162	28	10	10	54	.276
1985	New York	N	OF	93	337	56	93	16	8	6	26	.276
1986	New York	N	OF	123	381	61	110	17	5	9	45	.289
1987	New York	N	OF	124	385	58	115	19	7	9	34	.289
1988	New York	N	OF	112	378	61	112	17	5	8	41	.296
1989	New York	N	OF	80	249	22	51	10	1	3	18	.205
	Toronto	A	OF	54	238	32	71	9	1	2	17	.298
1990	Toronto	A	OF	147	588	81	156	36	4	3	51	.265
1991	Toronto	A	OF	86	241	26	58	12	4	2	28	.241
National League Totals				1116	4827	592	1113	170	62	60	342	.276
American League Totals				287	1067	139	283	57	9	7	96	.267
Major League Totals				1403	5894	731	1396	227	71	67	438	.274

Major League Stolen Bases: 1986 (7); 1981 (24); 1982 (56); 1983 (54); 1984 (46); 1985 (24); 1986 (25); 1987 (21); 1988 (15); 1989 (12NY, 7Tor); 1990 (23); 1991 (11). Total 327.

Championship Series Record

Year	Club	Lea.	Pos.	G	AB	R	H	2B	3B	HR	RBI	AVG
1986	New York	N	OF	6	26	2	3	0	0	0	1	.115
1988	New York	N	OF	4	13	2	2	0	0	0	1	.154
1989	Toronto	A	OF	5	19	2	5	0	0	0	2	.263
1991	Toronto	A	DH-OF	3	8	1	2	0	0	0	0	.250
Totals				18	66	7	12	0	0	0	4	.182

Tied Championship Series record for most at bats game (7), Oct. 15, 1985 (16 at.).

World Series Record

Year	Club	Lea.	Pos.	G	AB	R	H	2B	3B	HR	RBI	AVG
1986	New York	N	OF	7	26	3	7	1	0	0	0	.269

APPLICANT 02941

Opposition No. 91125615
Univ. Southern California v.
Univ. South Carolina

Opposer's
Ex. No. 276, Pg. No. 3



APPLICANT 02963

BASEBALL AT SARGE FRYE

Opposition No. 91125515
Univ. Southern California v.
Univ. South Carolina

Opposer's
Ex. No. 276, Pg. No. 4

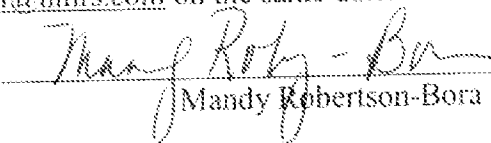
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **OPPOSER'S NOTICE OF RELIANCE NO. 18 RELATING TO DOCUMENTS PRODUCED DURING DISCOVERY IN THIS ACTION AND ADMISSIBLE BY NOTICE OF RELIANCE PURSUANT TO STIPULATION BETWEEN ALL PARTIES** is being placed in the United States mail, first class, postage pre-paid, on January 10, 2006, addressed to the following:

John C. McElwaine
Liberty Center, Suite 600
151 Meeting Street
Charleston, SC
29401-2239

Attorneys for Applicant University of South Carolina

A copy is being sent by e-mail to ICM@mmrs.com on the same date.


Mandy Robertson-Bora